

**Climate Pollution Reduction Grants Program:
Implementation Grants Competition for Tribes and Territories
Notice of Funding Opportunity (NOFO)
EPA-R-OAR-CPRGT-23-09
Questions and Answers as of **November 14, 2023****

The U.S. Environmental Protection Agency (EPA) is accepting applications for funding under the Climate Pollution Reduction Grants Program: Implementation Grants Competition for Tribes and Territories (EPA-R-OAR-CPRGT-23-09) until **May 1, 2024 at 11:59 p.m. (ET)**.

The NOFO and all application forms are available at <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>. EPA hosted informational webinars on September 27, 2023, and October 5, 2023. Recordings and material from those webinars can be found [here](#).

This document contains responses to questions raised in EPA's informational webinars and to questions submitted to the CPRG email inbox. EPA plans to update this document regularly with additional incoming questions regarding the CPRG Implementation Grants Competition for Tribes and Territories. (Note that responses to questions about the CPRG Implementation Grants General Competition (EPA-R-OAR-CPRGI-23-07) are located in a separate document available [here](#)).

Please review all questions and answers in this document. Questions marked **NEW** or **UPDATED** have been added or revised since the last posting of this document. If you have any additional questions, please email CPRG@epa.gov by **April 15, 2024** in order for EPA to provide a response prior to the competition application closing date of May 1, 2024.

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I. Application Process and Timeline

Q1: What is the application deadline for the CPRG implementation grants Tribes and territories competition?

A1: Applications for the implementation grants competition for Tribes and territories (EPA-R-OAR-CPRGT-23-09) are due on May 1, 2024.

Q2: What is the difference between the two notices of funding opportunity for CPRG implementation grants: the general competition and the competition for Tribes and territories?

A2: Generally speaking, eligible applicants for the general competition (EPA-R-OAR-CPRGI-23-07) are states, municipalities, Tribes, Tribal consortia, territories, and groups thereof, whereas eligible applicants for the Tribal and territories competition (EPA-R-OAR-CPRGT-23-09) are limited to Tribes, Tribal consortia, territories, and groups thereof. Other important differences between these two competitions, such as funding amounts, evaluation criteria, and application deadlines, are described in detail in the Notices of Funding Opportunity (NOFOs) for these two competitions, both available at: <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>.

Q3: Can eligible applicants from Tribes and territories apply for grants under both the general competition NOFO and the Tribes and territories NOFO?

A3: Yes. A Tribe or territory may submit applications in both the general competition and the Tribes and territories competition. Furthermore, a Tribe or territory may submit applications to implement the same measure under both competitions. Applicants must apply separately to each competition, and they must submit applications that meet the specific requirements of each competition, which are not the same. One application will not automatically serve for both programs.

In the event that both applications score well enough to be selected under the two separate competitions, EPA would only make one grant award to the applicant.

Q4: How do the implementation grants relate to the CPRG planning grants?

A4: As explained in Section I.A of the Tribes and Territories Competition NOFO (page 5), the 2022 Inflation Reduction Act (IRA) established the CPRG program, which provides funds in two distinct but related phases:

1. Planning grants: \$250 million for states, U.S. territories, municipalities, air pollution control agencies, Tribes, and groups thereof to develop plans to reduce greenhouse gases (GHGs). The Priority Climate Action Plan (PCAP) is the first deliverable due under the CPRG planning grants.
2. Implementation grants: \$4.6 billion for competitive grants to eligible applicants to implement GHG reduction programs, policies, projects, and measures (collectively referred to as "GHG reduction measures," or "measures") identified in a PCAP developed under a CPRG planning grant.

Q5: Do I have to submit a Notice of Intent (NOI) to Apply? What information is required for submitting a Notice of Intent to Apply? Will EPA provide any feedback in response to a NOI?

A5: To allow for efficient management of the competitive process, EPA requests submittal of an informal *Notice of Intent (NOI) to Apply* by March 1, 2024, to CPRG@epa.gov. As described on page 1 of the

NOFO, please include in the body of the email the dollar amount of the anticipated funding request and one to two sentences about the scope and sector(s) of the greenhouse gas (GHG) reduction measures likely to be included in the potential implementation grant application. Additionally, if intending to apply as the lead applicant representing a coalition, please list all anticipated coalition members.

Submission of an NOI is optional and non-binding; it is a process management tool that will allow EPA to better anticipate the resources required for efficient evaluation of submitted applications. EPA will not be able to provide feedback in response to an NOI.

Q6: Will a list of organizations that have submitted NOIs be released?

A6: EPA does not anticipate publishing a list of organizations that submit NOIs.

Q7: How many applications can I submit?

A7: As described on page 19 of the NOFO, each eligible applicant is limited to submitting two grant applications for this NOFO: one as an individual applicant and one as the lead applicant for a coalition. Applicants may participate in more than one coalition but may only serve as lead applicant for one coalition.

Note, Tribes and territories may submit applications to both this competition and the CPRG Implementation Grants General Competition.

Q8: What is the timeframe for the grants? How much time will a grantee have to complete the projects?

A8: The estimated period of performance for awards resulting from this solicitation will be up to five years. The estimated project start date for awards is December 1, 2024. See Section II.F of the NOFO.

Q9: When are PCAPs due? Does EPA have to approve the PCAPs?

A9: As explained in Section I.A of the NOFO, PCAPs are due April 1, 2024, for Tribes, Tribal consortia, or territories that plan to apply to the CPRG implementation grants competition for Tribes and territories. Otherwise, PCAPs are due March 1, 2024, for states, Metropolitan Statistical Areas (MSAs) and Tribes, Tribal consortia, and territories that plan to apply to the CPRG implementation grants general competition.

EPA project officers will review submitted deliverables, including PCAPs, to ensure they meet the requirements of the [CPRG Planning Grant Program Guidance](#) and the terms and conditions of the planning grants. EPA will not approve or provide feedback on the list of GHG measures included in a PCAP or analyses related to those measures.

Q10: Is it possible to submit my PCAP earlier than the due date to get further guidance on our implementation grants to increase chances of an implementation award?

A10: Due to the competitive nature of the implementation grant phase of the CPRG program, EPA will not be able to provide feedback on PCAPs.

Q11: Where and when will I be able to find the PCAPs? Are there any requirements or expectations that PCAP lead organizations make publicly available their draft plans or some level of information prior to the PCAP deadline?

A11: The CPRG planning grant program guidance specified that when developing a PCAP, lead organizations must coordinate and collaborate with other eligible entities within their jurisdictions and

ensure that priority measures are included in the plan that can be implemented by those entities (page [19](#) of CPRG Planning Grant Program Guidance for States, Municipalities, and Air Pollution Control Agencies; page [13](#) of CPRG Planning Grant Program Guidance for Federally Recognized Tribes, Tribal Consortia, and U.S. Territories). In all cases, the lead organizations for CPRG planning grants are required to make their PCAPs available to other entities for their use in developing implementation grant applications, and EPA will publicly post all PCAPs received on the [CPRG website](#).

EPA strongly encourages lead organizations to make draft versions of their PCAPs available as early as possible so that entities considering whether to submit an implementation grant application can begin development of their applications well before the May 1, 2024 deadline for the Tribes and territories competition. Please see page 7 of the NOFO for more information.

EPA also encourages eligible applicants that are considering applying for a CPRG implementation grant to participate in the PCAP development process and provide input on priority measures to include in the plan, in collaboration with other participants and stakeholders. Section 8.4.3 of the Planning Grants Program Guidance for States, Municipalities, and Air Pollution Control Agencies, and Section 7.4.3 of the Planning Grants Program Guidance for Federally Recognized Tribes, Tribal Consortia, and U.S. Territories provides more information on coordination and engagement.

Q12: Can an applicant apply for an implementation project before a PCAP is complete?

A12: As described in the project narrative requirements section of the NOFO (page 27), applicants for the CPRG implementation grants must include applicable PCAP reference(s) with their application including PCAP lead organization, PCAP title, PCAP website link, list of GHG reduction measures, and PCAP page numbers, which will not be available until the PCAP is complete.

Q13: Will this grant require matching funds?

A13: As explained in Section III.B of the NOFO (page 18), no cost sharing, matching funds or leveraged resources are required as a condition of eligibility under this competition.

Q14: Will EPA offer additional rounds of funding, including for measures in the Comprehensive Climate Action Plans? Or is this the only opportunity for CPRG implementation grants?

A14: EPA plans to award all available implementation grant funds (totaling \$4.6 billion through the two competitions that were announced on September 20, 2023) by the end of 2024. EPA anticipates awarding funds for the general competition in October 2024 and funds for the competition for Tribes and territories in December 2024. No additional rounds of CPRG implementation funding are anticipated at this time.

Q15: What tools, resources, and technical assistance will EPA provide for applicants? Will EPA host webinars or trainings on the NOFOs?

A15: Section IV of each NOFO provides important guidance on the information EPA would like to be provided in the grant application; and section V of each NOFO describes the evaluation criteria and scoring breakdown. EPA has provided example templates for the cover page and budget, and additional guidance in appendix E on calculation methodologies for the GHG reduction measures included in the application.

EPA has compiled publicly available tools and technical resources to assist eligible applicants with climate planning and made them available on EPA's [CPRG website](#). EPA's Office of Grants and

Debarment offers training and resources to assist applicants with preparing and submitting grant applications at: <https://www.epa.gov/grants/epa-grants-overview-applicants-and-recipients>.

EPA held informational webinars on the Tribes and territories competition on September 27 and October 5, 2023, and on the general competition on September 21 and October 3, 2023. Materials from these webinars are available [here](#). To stay informed about any additional webinars for implementation grant applicants, please visit the CPRG website for updates, and please sign up for the [CPRG Newsletter](#).

Q16: How will EPA responses to questions be documented?

A16: EPA will periodically update this Q&A document on the Tribes and territories competition, and a separate Q&A document for the general competition, with questions received through the CPRG@epa.gov inbox and during the EPA informational webinars. Updated versions of each document will be posted publicly to the EPA CPRG website: <https://www.epa.gov/inflation-reduction-act/cprg-implementation-grants>.

New questions posted October 31, 2023

Q17: Should this NOFO inform what I put in my PCAP?

A17: As explained on page 6 of the NOFO, applications for CPRG implementation grants under the Tribes and territories competition must seek funding to implement measures that are included in a PCAP developed with funding from a CPRG planning grant. EPA has published the competition details well in advance of the application deadline so that entities considering whether to submit an implementation grant application will be able to take elements of the implementation evaluation criteria into consideration when developing their PCAP. EPA encourages eligible applicants that are considering applying for a CPRG implementation grant to participate in the PCAP development process and provide input on priority measures to include in the plan, in collaboration with other participants and stakeholders.

Q18: How should we determine the scope of measures to include in our application?

A18: An eligible applicant, including lead organizations for CPRG planning grants, may apply for implementation funding for one, some, or all of the GHG measures included in an applicable PCAP that could be implemented by that applicant (not all measures in a PCAP may be appropriate for implementation by all eligible applicants). Eligible applicants should review Sections IV and V of the NOFO to determine what information and what level of specificity to include in an application. An eligible applicant that is not the lead organization for a planning grant should coordinate and communicate with the lead organization for the planning grant so that the PCAP includes priority measures that the eligible applicant may implement.

II. Eligible Applicants

Q1: Who is eligible to apply for an implementation grant under the Tribes and territories competition? If I didn't receive a planning grant, am I still eligible to apply? Do I have to develop my own PCAP to apply?

A1: As explained in Section III.A (pages 16-18) of the Tribes and territories competition NOFO, entities eligible to apply for an implementation grant under this announcement are federally recognized Tribes, Tribal consortia, and territories. More specifically, Tribes, Tribal consortia, and territories that directly received a CPRG planning grant are eligible to apply for an implementation grant. In addition, Tribes,

Tribal agencies, Tribal consortia, and territorial municipal agencies, departments, or other municipal government offices in Guam, American Samoa, Northern Mariana Islands, and U.S. Virgin Islands that did not directly receive a planning grant, but that seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP (submitted to EPA by April 1, 2024), are eligible to apply. An applicable PCAP is one that geographically covers the entity and contains GHG reduction measures that can be implemented by the entity. Please consult Table 2 of the NOFO for additional detail.

Q2: What does it mean to be covered by a PCAP? Can I be covered by multiple PCAPs?

A2: As explained in Section III.A of the NOFO, Tribes, Tribal agencies, Tribal consortia, and territorial municipalities that did not directly receive a planning grant but that seek funding to implement one or more GHG reduction measures that are included in an applicable PCAP are eligible to apply. An applicable PCAP is one that geographically covers an entity and contains GHG reduction measures that can be implemented by the entity.

An entity may be covered by multiple PCAPs in some cases. For example, an applicable Tribal PCAP and an applicable state PCAP may each include measures that a particular Tribe could implement. The Tribe could reference measures from either or both PCAPs in its application.

Q3: Are multiple agencies or offices within a Tribal or territorial government able to apply?

A3: Yes, multiple agencies, departments, or other offices from a Tribe or territory are each eligible to apply. However, EPA recommends that such agencies coordinate with each other to avoid submitting more than one application to implement the same GHG reduction measure in the same geographic location. See Table 2 (page 16-17) of the NOFO for more information.

Q4: Are there any restrictions on the size and type of coalition I can organize for an implementation grant application?

A4: As explained in Section III.A of the NOFO, a coalition consists of two or more eligible applicants applying to jointly implement one or more measures. A coalition may be comprised of any combination of eligible applicants, at the same or different levels of government. For example, a coalition could include two or more Tribes or Tribal consortia, multiple territorial municipalities, or a state and one or more Tribes. In all cases, each coalition member must be an eligible applicant and be covered by a PCAP that contains the measure(s) for which the coalition seeks funding. For purposes of this program, a Tribal consortium is an eligible applicant and as such may participate as a member and/or a lead applicant for a coalition.

As explained in section 1 of the workplan expectations (page 28 of the NOFO), a coalition application should briefly describe the role(s) and responsibilities of each coalition member in the project design and implementation. The application should also include an explanation of how each GHG reduction measure included in the application relates to a GHG reduction measure included in the relevant PCAP(s), why each measure was selected as a priority, and a description of how each measure will meet the goals of the CPRG program. To implement a measure as a coalition, each coalition member needs to have the same measure included in their respective PCAP.

One entity must be the lead applicant (see Section III.A) and responsible for managing any grant awarded under this program (see Section IV.C). Multiple eligible entities may apply as a coalition if the group shares a strong and substantial commitment to the proposed measures such that withdrawal by

any single member from the coalition would fundamentally alter the design or expected outputs and outcomes of the proposed measures.

Not all partnerships are coalitions. For example, an individual applicant can apply for an implementation grant and have a partnership or collaboration with organizations that are not eligible to serve as the lead applicant (e.g., non-profit organizations or private sector companies). This type of arrangement would not be considered a coalition under CPRG.

Both an individual applicant, and the lead applicant of a coalition, may make subawards to partners (subrecipients) or use contractual arrangements to carry out a portion of the grant's activities in accordance with the guidelines for subawards and procurement activities described in Appendix A of the NOFO.

Q5: Can I use a climate action plan that is not funded through a CPRG planning grant as the basis for my implementation grant application?

A5: No. Applications for implementation grants must seek funding to implement measures that are included in a PCAP developed with funding from a CPRG planning grant (see Section I.B of the NOFO). Under the Tribes and territories competition, implementation grant applicants must seek to implement measures included in a PCAP submitted to EPA by April 1, 2024 (state and MSA PCAPs are due March 1, 2024).

Q6: What entities are eligible to apply from Florida, Iowa, Kentucky, and South Dakota?

A6: Tribes and Tribal consortia within the geographical boundaries of these states that received a planning grant or are otherwise covered by an MSA or Tribal PCAP are eligible to apply.

Q7: Under a coalition, would coalition members be subgrantees of the coalition lead?

A7: Yes, coalition members would be subgrantees of the lead applicant for a coalition. However, the lead applicant for a coalition must submit a Memorandum of Agreement (MOA) signed by all coalition members or other written instrument or documented arrangement as part of their application that clarifies the roles and responsibilities of all coalition members. All members of the coalition must be listed as subrecipients, except the eligible applicant that will be the recipient of the grant (the lead applicant). See Section III.A, Section IV.C, and Appendix E for more information on coalitions.

Q8: Can I still apply for a planning grant to develop a PCAP?

A8: The funding opportunity for the planning grants is closed. Eligible applicants that did not receive a planning grant may still apply for an implementation grant if they are covered by a PCAP as discussed in Section III.A of the Tribes and territories competition NOFO.

Q9: Would EPA accept a less formal type of agreement for a coalition than a Memorandum of Agreement (MOA)? What if I am unable to get an MOA signed by all coalition members by the deadline for the application?

A9: For the Tribes and territories competition, coalition members must demonstrate their commitment to the coalition and to fulfilling their role to ensure success of the proposed measures through a signed Memorandum of Agreement (MOA), or through another written instrument or documented arrangement. The MOA or other written instrument or documented arrangement should clarify the roles and responsibilities of all coalition members. The lead applicant for the coalition should submit the

MOA or other written instrument or documented arrangement as an attachment as described in Section IV.B and Appendix E (“Guidelines for a Memorandum of Agreement for a Coalition”), as applicable. EPA does not have a specific format for the MOA or other written instrument or documented arrangement, but it should contain the elements provided in Appendix E of the NOFO.

Q10: Does the MOA or other written instrument or documented arrangement need to be complete by the time I submit a Notice of Intent to Apply (NOI)?

A10: No, the MOA or other written instrument or documented arrangement does not need to be completed before the submission of the NOI, but NOIs should list anticipated coalition members to the extent known. As the NOI is strongly recommended but optional, applicants will not be evaluated on the information included in the NOI.

Q11: Can I add someone to the coalition after I apply?

A11: EPA will not consider information submitted to EPA after the close of the NOFO, including additions of new members to a coalition. However, in the event that an applicant needs to make updates or changes to a submitted application *prior* to the application deadline, including adding coalition members and an updated MOA or other written instrument or documented arrangement, they may submit a revision to the application *as long as it is prior to the deadline*. Grants.gov provides [instructions](#) for applicants to make modifications to their application and resubmit their Grants.gov Workspace.

New questions posted October 31, 2023

Q12: Are there benefits of applying as a coalition? Would EPA prefer that Tribes and territories interested in implementing a GHG measure apply as part of a coalition or that they submit separate applications?

A12: As explained in Section I.B of the NOFO, the CPRG Tribes and territories competition is designed to incentivize eligible applicants to apply for funding together as a coalition to implement GHG reduction measures regionally and across multiple Tribal boundaries and consortia. Details on eligible applicants and coalitions are available in Section III.A. Each eligible applicant is limited to submitting two grant applications: one as the individual applicant and one as the lead applicant for a coalition. Applicants may also participate in more than one coalition (as a non-lead applicant). However, it is up to each applicant (or coalition of applicants) to determine the approach that is most appropriate for the selected measure(s) and most responsive to the evaluation criteria in the NOFO. Each application, whether from an individual entity or a coalition, will be evaluated on the strength of its proposal; there is no adjustment to evaluation criteria or to scoring for coalition applications. Please note that for purposes of this program, a Tribal consortium is an eligible applicant and as such may participate as a member and/or a lead applicant for a coalition.

Q13: Are Tribal consortia that are receiving planning grants, such as the Alaskan Native Tribal Health Consortium (ANTHC), eligible to apply for implementation grants? Are Alaskan Native Corporations eligible? May Tribal consortia subgrant to Alaskan Native Corporations?

A13: Tribes and Tribal consortia that received planning grants as well as those that did not receive a planning grant but are covered by an applicable Tribal, state, or MSA PCAP are eligible to apply. ANTHC received a CPRG planning grant and is eligible to apply for an implementation grant.

As explained in footnote 4 on page 5 of both the general competition NOFO and the Tribes and territories competition NOFO, Alaskan Native Corporations are not eligible applicants for an implementation grant but could receive subawards from eligible CPRG implementation grantees as long as they meet EPA subaward requirements.

New questions posted November 14, 2023

NEW Q14. *Are for-profit entities eligible to apply for CPRG implementation grants? If not, how can a for-profit entity participate in the CPRG program?*

A14: For-profit entities are not eligible to apply for this funding opportunity. However, there are several circumstances in which a for-profit entity may participate in a GHG reduction measure funded under an implementation grant.

A CPRG grant recipient may provide rebates, subsidies, or similar one-time, lump-sum payments to for-profit entities for the purchase of technologies that reduce GHG emissions. Such expenditures by the grant recipient would be considered participant support costs. For example, a state could receive funding to implement a rebate program and provide funding to for-profit entities (e.g., private trucking companies) to replace their existing fleet with EVs. Please see Appendix A of the NOFO, [RAIN-2018-G05](#), and “[EPA Guidance on Participant Support Costs](#),” for further guidance on participant support costs.

A for-profit entity also may participate in a GHG reduction measure if the grant recipient chooses to contract work out to the for-profit entity. A contract (as described in [2 CFR § 200.331](#)) is for the purpose of obtaining goods and services for the grant recipient’s own use and creates a procurement relationship with the contractor. Grant recipients that enter into procurement contracts must comply with the applicable procurement provisions in [2 CFR § 200.317 through 200.327](#). For example, a city could hire a private company to conduct energy audits on city buildings. As noted in [2 CFR § 200.319](#), the example procurement would likely require a fair and open competition. Please see [EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

Finally, a grant recipient may subaward a portion of the grant to a for-profit entity. Subawards establish a financial assistance relationship under which the subrecipient’s employees and contractors implement programs and projects to accomplish the goals and objectives of the grant. For example, a state could provide a subaward to a private company to carry out a specific project under their broader state-run industrial energy efficiency program. While it is not common for subawards to be provided to for-profit entities, EPA’s subaward policy notes that “EPA’s Award Official must approve subawards to for-profit entities and individuals on the basis of either a precise description of the subaward in the EPA approved budget and project narrative, or on a transaction-by-transaction basis.” Subrecipients are subject to the same federal requirements as the grant recipient (also known as the “pass-through entity”) and they must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA’s General Term and Condition for Subawards](#).

For-profit entities that receive a contract or subaward are subject to [Build America, Buy America](#) requirements and the Davis-Bacon Act.

NEW Q15: *Does a Tribal consortium need to submit a memorandum of agreement (MOA) as part of its implementation grant application?*

A15: A consortium of federally-recognized Tribes is an eligible applicant in its own right and does not need to submit an MOA as part of its implementation grant application if it is accountable to the Tribes in the Tribal consortium.

A Tribal consortium may apply as an individual applicant, and as the lead for a coalition of other eligible applicants. A Tribal consortium may also participate in a coalition (i.e., as a member of the coalition, not the lead applicant for the coalition). A Tribal consortium does not need to submit an MOA if applying as an individual applicant but would need to sign an MOA if participating with other eligible applicants in a coalition.

NEW Q16: *How can non-profits and non-profit community-based organizations (CBOs) participate in a CPRG implementation grant?*

A16: Eligible applicants for CPRG implementation grants are states, municipalities, Tribes, territories, and groups thereof. In general, non-profits and CBOs are not eligible to apply for CPRG implementation grants. However, there are several circumstances in which a non-profit or CBO may participate in a GHG reduction measure funded under an implementation grant.

A grant recipient (also known as the pass-through entity) may subaward a portion of the grant to a non-profit or CBO. Subawards establish a financial assistance relationship under which the subrecipient's employees and contractors implement programs and projects to accomplish the goals and objectives of the grant. Subrecipients are subject to the same federal requirements as the pass-through entity and must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA's General Term and Condition for Subawards](#).

Non-profits or CBOs may also be beneficiaries of participant support costs from an implementation grantee. For example, a grantee could provide participant support costs in the form of a rebate to a non-profit to install solar panels plus storage on the non-profit's facility. Please see Appendix A of the NOFO, [RAIN-2018-G05](#), and "[EPA Guidance on Participant Support Costs](#)," for further guidance on participant support costs.

A non-profit or CBO also may participate in a GHG reduction measure if the grant recipient chooses to contract work out to the non-profit or CBO. A contract (as described in [2 CFR § 200.331](#)) is for the purpose of obtaining goods and services for the grant recipient's own use and creates a procurement relationship with the contractor. Grant recipients that enter into procurement contracts must comply with the applicable procurement provisions in [2 CFR § 200.317 through 200.327](#). Please see [EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#).

Finally, non-profits and CBOs may participate in community engagement aspects of the implementation grants program. For example, a CPRG Tribes and territories implementation grant application will be evaluated on how measures taken are expected to impact communities, particularly those that are disadvantaged, and how continued meaningful engagement has shaped the application and future implementation of proposed measures (page 32 of the NOFO).

III. Eligible Measures

Q1: What types of projects are eligible for funding?

A1: Applications must propose to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant and meet the threshold eligibility criteria in Section III.C. of the NOFO (page 18). Additionally, any application should be consistent with EPA's goals for implementation funding (see Section I.B of the NOFO, page 6). It is up to each applicant to make the case to EPA in their application how their proposed measure adheres to the workplan requirements in Section IV of the NOFO and meets to the evaluation criteria established in Section V of the NOFO. An illustrative list of potential GHG reduction measures can be found on pages 8-11 of the NOFO. However, this list is neither exhaustive nor definitive with respect to the measures that may be included in applications under this NOFO. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their applications.

EPA will not respond to individual questions about whether specific GHG reduction measures are eligible and how they might score in the Tribes and territories competition.

Q2: Are carbon sink projects, or projects that enhance carbon removal, eligible?

A2: An eligible GHG reduction measure under the CPRG implementation grants program may reduce GHG emissions or enhance carbon removal. Measures that enhance carbon removal are those that increase the removal of carbon dioxide from the atmosphere through, for example, the uptake of carbon and storage in soils, vegetation, and forests. Such measures may include actions related to management of lands in their current use, or as lands are converted to other uses (see Section I.B., page 7, of the Tribes and territories competition NOFO).

Q3: Are climate adaptation or resilience measures eligible?

A3: Eligible projects must meet the threshold eligibility criteria in Section III.C. of the NOFO (page 18), including reducing GHG emissions or enhancing carbon removal. Climate adaptation and resilience measures that do not result in a reduction in GHG emissions or enhance carbon removal are not eligible.

Q4: Can an implementation grant application request funds to hire staff to implement GHG reduction measures included in the application?

A4: In the budget detail for the application, costs for implementing GHG reduction measures may include staffing and contractual costs necessary to implement GHG measures, as well as training and staff capacity-building costs. See pages 35-39 of the NOFO for more information.

Q5: Can an implementation grant application request funds for job training?

A5: In order to be eligible, applications must be fully responsive to the NOFO and must be to implement GHG reduction measures contained in a PCAP developed under a CPRG planning grant. Applications may request funding to be used for high-quality workforce development activities that are tied to or facilitate implementation of a proposed GHG reduction measure (page 32 of the NOFO).

Q6: How broadly or narrowly do GHG reduction measures need to be defined in the application?

A6: Applicants should review the application expectations in Section IV and the evaluation criteria in Section V of the NOFO to determine what level of specificity of the GHG reduction measures to include in the application. As explained in Section IV.B. of the NOFO, applications should provide details on each measure (page 27). Applicants should provide a detailed description of each of the proposed GHG

reduction measures to be undertaken. These descriptions should include the major features, tasks, and milestones for each measure and explain how to ensure success of the measures. The application should also describe underlying assumptions and risks associated with those features, tasks, and milestones.

Q7: Can I apply for funding to implement multiple GHG reduction measures in one application?

A7: Yes, applications may include one or more proposed GHG reduction measures. Applications will be evaluated as a whole, and GHG reduction measures will not be scored individually (page 8 of NOFO). Therefore, applicants should include only those measures that are eligible and that meet the requirements described in this announcement. For applications that include multiple GHG reduction measures, applicants should provide assumptions, calculations, and documentation for each GHG reduction measure.

Q8: Are implementation grants meant to implement a PCAP measure in its entirety, or can it focus on a subset of the components and actions in one measure?

A8: An eligible applicant may apply to implement a portion of a measure included in a PCAP but should explain how the measure included in the application relates to a GHG reduction measure included in the relevant PCAP(s) (page 28 of the NOFO). Applications should only quantify emission reductions that will occur as a result of CPRG implementation grant funding. If CPRG funding represents a fraction of the total funding for a GHG measure, the total estimated GHG emission reductions should be scaled as explained on page 29 of the NOFO.

New questions posted October 31, 2023

Q9: What types of infrastructure projects are eligible for CPRG funding (i.e., EV equipment infrastructure, pedestrian and bike path infrastructure, green infrastructure, etc.)?

A9: Infrastructure projects that reduce GHG emissions and meet the threshold eligibility criteria in Section III.C of the NOFO are eligible measures. An illustrative list of potential GHG reduction measures for which applicants may choose to seek CPRG implementation grant funding can be found on page 9 of the NOFO. EPA will not respond to individual questions about whether specific infrastructure projects are eligible and how they might score in the Tribes and territories competition.

Certain infrastructure projects that may be funded under this competition may be subject to domestic content sourcing requirements under the Build America, Buy America (BABA) provisions of the Infrastructure Investment and Jobs Act (IIJA). For more information, please see Section VI.D of the NOFO.

Q10: How specific do the measures listed in the PCAP have to be to ensure a given project is eligible under the implementation grant funding opportunity?

A10: Planning grantees and potential applicants for implementation grants should review the CPRG planning grant guidance for information about what to include in the PCAP, specifically section 14.2 of the planning grant program guidance for Tribes, Tribal consortia, and U.S. territories. The planning grant program guidance documents explain that, for each measure, the PCAP must provide an estimate of the quantifiable GHG emissions reductions, key implementing agency or agencies, implementation schedule and milestones, expected geographic location if applicable, milestones for obtaining implementing authority as appropriate, identification of funding sources if relevant, and metrics for tracking progress. While the PCAP does not necessarily need to identify specific GHG reduction projects by name and/or

location, it should adequately describe the GHG reduction measures that will be implemented in the future. Measures must be described with enough detail such that implementation grant applicants can provide an estimation of future GHG reductions associated with the measure. The PCAP does not need to identify the specific names of other eligible entities (e.g., such as specific cities or counties) that may implement a particular measure.

Implementation grant applications should provide, on the cover page, references to applicable PCAPs under which each GHG reduction measure is covered (including PCAP lead organization, PCAP title, PCAP website link, list of GHG reduction measures and corresponding PCAP page numbers) (page 27 of NOFO). As explained in section 1.a of the workplan expectations, applicants should include an explanation of how each GHG reduction measure included in the application relates to a GHG reduction measure included in the relevant PCAP(s) (page 27-28).

Q11: Does this program allow CPRG funding to be combined with other federal or non-federal funding? Are projects that receive CPRG Implementation grants allowed to apply for and receive federal tax credits through elective pay (also called "direct pay")?

A11: Yes, CPRG funding may be combined with other federal funding, including federal tax credits, or non-federal funding. As explained on page 7 of the NOFO, a GHG measure could be an expansion of a measure that is already being implemented. Furthermore, a GHG measure could be a new measure for which the applicant has already secured partial funding and needs additional funding from the CPRG program to secure the total funding needed to fully implement the measure.

As discussed in Section I.B of the NOFO, CPRG aims to support measures for which dedicated funding or financing from other sources is unavailable or that leverage other sources of public and private funding to the fullest extent possible prior to seeking CPRG funding. In section 1b of the workplan, applicants should explain if and how an applicant has explored the availability of other federal and state grants, tax incentives, and other funding sources to implement their GHG reduction measures and why these sources are not sufficient. The application should include a list of federal and non-federal funding sources that the applicant has applied for, secured, and/or will secure to implement the GHG reduction measures, if applicable. For GHG reduction measures for which the applicant has secured partial funding, which may include tax incentives, the applicant should explain why CPRG funds are also needed.

Applications should only quantify emission reductions that will occur as a result of EPA's CPRG implementation grant funding. If CPRG funding represents a fraction of the total funding for a GHG measure, the total estimated GHG emission reductions should be scaled by the same fraction in order to quantify GHG emission reductions associated with CPRG funding. In other words:

$$\text{Quantified GHG reductions from CPRG funding} = [(\text{Requested CPRG funding})/(\text{Total funding to implement measure})] \times (\text{Total estimated GHG reductions of measure})$$

Quantified reductions should not include those that would already occur because of federal, state, Tribal, territorial, local and/or other regulatory requirements or other funding sources.

Q12: Are grants in the program covered under Build America, Buy America (BABA)?

A12: As explained in Section VI.D of the NOFO, certain projects funded under this competition may be subject to domestic content sourcing requirements under the BABA provisions of the Infrastructure

Investment and Jobs Act (IIJA) (P.L. 117-58, §§70911-70917). These provisions apply when a grantee uses federal funds for the purchase of goods, products, and materials on any form of construction, alteration, maintenance, or repair of public infrastructure in the United States.

CPRG implementation grants are subject to BABA. Implementation grant recipients must comply with BABA requirements or obtain a waiver for each infrastructure project. Under BABA, the Buy America preference only applies to articles, materials, and supplies that are consumed in, incorporated into, or affixed to an infrastructure project. Mobile source vehicles/engines and infrastructure on a private residence for personal use do not constitute infrastructure projects under this program. A waiver exempting the three Pacific Island territories (Guam, American Samoa, and Northern Mariana Islands) from BABA requirements was granted effective July 5, 2023. A list of approved EPA [waivers](#) is available on the EPA [Build America, Buy America](#) website. Please see Section VI.D of the NOFO for additional details.

Q13: Are CPRG grants involving construction activities subject to the requirements of the Davis-Bacon Related Acts?

A13: Yes, as required by Section 314 of the Clean Air Act, grants under this program that involve construction activities are subject to prevailing wage requirements as determined by the U.S. Department of Labor under the Davis-Bacon Related Acts. These requirements apply to subgrantees and contractors of a CPRG implementation grant. See Section VI.C of the NOFO. The CPRG program uses the definition of construction defined in OGD Policy/40 CFR 33.103 which is the “erection, alteration, or repair of buildings, structures or other improvements to real property.”

Costs for architectural and engineering services are not construction costs subject to Davis-Bacon Related Acts and should be considered “contractual” costs. Construction activities carried out by the applicant’s own employees are not construction costs subject to Davis-Bacon Related Acts and should be considered “personnel” costs.

Q14: Are carbon capture and storage projects eligible for CPRG funding?

A14: Yes, an application that includes carbon capture and storage to reduce GHG emissions is eligible as long as the application meets the threshold eligibility criteria in Section III.C of the NOFO. It is up to each applicant to make the case to EPA in their application how their proposed measure adheres to the workplan requirements in Section IV of the NOFO and meets the evaluation criteria established in Section V of the NOFO. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their applications.

New questions posted on November 14, 2023

NEW *Q15: Can applicants apply to implement a workforce development program on its own or must the workforce development program be tied to GHG emissions reductions?*

A15: Applicants may request funds to be used for workforce development activities as long as the activities are tied to a proposed GHG reduction measure. While applicants do not need to estimate GHG reductions associated with a workforce development component of a proposed GHG reduction measure, applicants must estimate GHG reductions associated with each measure included in the application. Workforce development activities should be focused to enable the applicant to carry out the proposed GHG reduction measures in their application by training workers and building a skilled

workforce. For example, a GHG reduction measure focused on industrial efficiency and electrification may include workforce development activities to train energy efficiency auditors and electricians.

NEW Q16: *Are approaches and technologies included in a GHG reduction measure limited to those that result in zero GHG emissions? For example, could a measure employ technologies that reduce GHG emissions but do not achieve zero emissions?*

A16: An application that includes approaches to reduce GHG emissions is eligible for the CPRG implementation grant competition as long as the application meets the threshold eligibility criteria in Section III.C of the NOFO. A proposed GHG reduction measure does not need to result in zero GHG emissions. It is up to each applicant to make the case to EPA in their application how their proposed measure meets the evaluation criteria established in Section V of the NOFO. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their application.

IV. Contracts, Subawards, and Participant Support Costs

Q1: Can an applicant applying as an individual applicant make subawards to other eligible applicants, non-eligible entities, and contractors? If so, what requirements apply to subawards?

A1: Yes, an individual applicant that is awarded an implementation grant may procure contractual support and/or issue subawards to subrecipients to carry out a portion of the grant project as described in Appendix A of the NOFO.

A contract (as described in 2 CFR § 200.331) is for the purpose of obtaining goods and services for the grant recipient's own use and creates a procurement relationship with the contractor. Grant recipients that enter into procurement contracts must comply with the applicable procurement provisions in 2 CFR § 200.317 through 200.327.

Grant recipients may make subawards to subrecipients to carry out a portion of the grant project; in such case, the grant recipient is also known as a "pass-through entity." Subawards establish a financial assistance relationship under which the subrecipient's employees and contractors implement programs and projects to accomplish the goals and objectives of the grant. It is important to bear in mind that subrecipients are subject to the same federal requirements as the pass-through entity. Under this competition, a non-federal entity is eligible to receive a subaward even if it is not eligible to receive a grant from EPA directly. If a recipient chooses to pass funds from its grant to other entities through subawards, the recipient must comply with applicable subaward provisions of 2 CFR Part 200, the [EPA Subaward Policy](#), and [EPA's General Terms and Conditions for Subawards](#).

Q2: Could a non-profit group be paid with CPRG planning grant money to write an implementation grant for a Tribe, Tribal consortium, or territory?

A2: Funds from the CPRG planning grants must go toward completing the required deliverables established in the Planning Grant Program Guidance. While grantees may sub-award planning grant funds to non-profits and may procure contractors to support the development of the CPRG planning grant deliverables, sub-awarding planning grants to a non-profit group to write an implementation grant application is not an eligible cost for the planning grants.

New questions posted on November 14, 2023

NEW Q3: *Would a contractor that is working for a CPRG grantee on developing its Priority Climate Action Plan have a conflict of interest that would prevent it from doing work on a GHG reduction measure that is funded by an implementation grant?*

A3: Under 2 CFR 200.319(a), the grantee must, to the maximum extent possible, ensure open and free competition when seeking procurement contracts. A contractor working on a Priority Climate Action Plan for a planning grantee is not inherently conflicted from conducting work for an awarded implementation grant. A contractor would be able to compete for implementation work so long as the contractor did not develop or draft sample language, templates, specifications, requirements, statements/scopes of work, invitations for bids, or requests for proposals that the grantee of an implementation grant will use in a request for proposals for the implementation grant. See 2 CFR 319(b). Also see pages 9 and 10 of the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#), which list circumstances that may indicate restricted competition for grantees seeking procurement contracts.

NEW Q4: *Can EPA explain more about what it means by “firms or individual consultants that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements as provided in 2 CFR 200.319(b)”?*

A4: Under 2 CFR 200.319(a), the grantee must, to the maximum extent possible, ensure open and free competition when seeking procurement contracts. As indicated in the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#), EPA interprets 2 CFR 200.319(b) to preclude applicants and recipients from working with, using sample language or templates from, accepting free services from, or hiring any contractors to develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals for procurements if that contractor will be competing for the resultant contract. For example, if a grantee hires a consultant to draft the statement of work for a request for proposal for a procurement contract it is seeking, that consultant cannot also compete for that procurement contract.

NEW Q5: *Does a grant applicant or grant recipient need to conduct a competition for participant support costs (PSCs) or subawards? If so, must that competition be done in advance of receiving the grant or can grantees select program beneficiaries after the grant is awarded?*

A5: PSCs are not competed and subawards do not need to be competed. Grantees may select subrecipients of a subaward and program beneficiaries of PSCs after the grant is awarded.

Under 2 CFR 200.456, grant recipients must obtain prior written approval from EPA’s Award Official or another authorized official (typically a Grants Management Officer) to use Agency funds for PSCs. This is met by specifying the amount of PSCs in the recipient’s budget narrative and workplan (PSCs go under the ‘Other’ category). Under 40 CFR Part 5 and 40 CFR Part 7, recipients may not administer EPA funded PSC programs in a manner that discriminates on the basis of race, color, national origin, sex, age or disability. Applicants should review EPA’s guidance on [Participant Support Costs](#) for more information.

Applicants participating as a member of a coalition would be subrecipient of the lead applicant for a coalition and must be signatories of the Memorandum of Agreement (MOA) included in the application.

V. Competition Structure

Q1: What size grants can I apply for?

A1: As explained in Section II.B (page 14) of the NOFO, applicants for the Tribes and territories competition can apply for grants ranging from \$1 million to \$25 million:

Tier	Grant Ranges	Funds Targeted for Each Tier	Anticipated Number of Grants to be Awarded
Tier A	\$15,000,000 – \$25,000,000	\$125 million	5-8
Tier B	\$5,000,000 – \$14,999,999	\$100 million	7-20
Tier C	\$1,000,000 – \$4,999,999	\$75 million	15-75

Q2: How many applications can an eligible applicant submit? Is there an application limit per tier?

A2: Each eligible applicant is limited to submitting two grant applications in total for this competition for Tribes and territories: one as an individual applicant, and one as the lead applicant for a coalition. Such applications may be in the same or in different tiers. Applicants may participate in more than one coalition but may only serve as lead applicant for one coalition (see Section III.A of the NOFO).

Q3: Can two entities submit separate applications to fund the same measure?

A3: As a threshold matter, EPA does not prohibit two eligible applicants from applying to fund the same measure under this NOFO. Furthermore, Tribes and territories may apply to implement the same measure in both the Tribes and territories competition and the general competition. However, EPA will not award multiple grants to implement the same measure in the same location (e.g., a territory and territorial municipality will not both receive a grant to implement a particular measure from the territory's PCAP in the municipality; either the territory or the municipality may receive the grant, but not both). Therefore, EPA strongly recommends that entities that may be considering applying for funding to implement similar measures communicate and coordinate prior to submitting applications.

EPA **does** prohibit a group of eligible applicants applying as a coalition from submitting multiple applications for the same set of GHG reduction measures using different lead applicants (page 19 of NOFO).

Q4: The NOFO states that EPA will not award multiple grants to implement the same measure in the same location. Can you clarify what you mean by "same location"?

A4: EPA will not fund duplicative work, i.e., multiple grants cannot fund the same measure being implemented in the same exact or overlapping geographic vicinity. For example, if a territorial agency applied to implement a measure across all jurisdictions in the territory and a municipality within that same territory applied to implement the same measure within their municipality, EPA would not fund both applicants as there would be an overlapping geographic scope for the same measure. However, if two eligible entities (e.g., a Tribe and a municipality) within the same state boundaries applied to implement the same measure only within their own respective boundaries and there was no overlap of geographic area, then both applications could receive funding (if both ranked highly enough to be recommended for funding).

New questions posted October 31, 2023

Q5: Will EPA partially fund an implementation grant application? Would my application compete in a separate tier if it is partially funded?

A5: EPA intends to evaluate and make selections for award based on applications as a whole. If an application includes multiple GHG reduction measures, EPA does not intend to evaluate and score each measure individually. Therefore, applicants should include only those measures that are eligible and responsive to the criteria in the NOFO.

In general, EPA does not intend to partially fund applications or to move applications among tiers. In limited circumstances, however, EPA reserves the right to partially fund an application. If EPA decides to do so, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application was evaluated and selected for award (see Section II.C of NOFO).

New questions posted on November 14, 2023

***NEW** Q6: What does EPA mean by “EPA anticipates awarding no more than two grants to applicants at the same level of government within a single jurisdiction”? Would EPA only award two grants total to local governments in a state?*

A6: In Section V.B of the Tribes and Territories NOFO (page 48), EPA explains that *EPA anticipates awarding no more than two grants to applicants at the same level of government within a single jurisdiction* (e.g., a single tribal area or territory). This means that EPA anticipates that:

- No more than two applications from a single Tribe would be awarded a grant.
- No more than two applications from the government of a territory (such as from different agencies) would be awarded a grant.
- No more than two applications from a given municipality would be awarded a grant.

It is possible that more than two Tribes or Tribal consortia located within the geographic boundary of a state may receive implementation grants. Also, as coalitions may be comprised of geographically diverse entities, these targets do not necessarily apply to coalition applications. In addition, as stated in the NOFO, EPA anticipates making selections to ensure diverse geographic coverage of CPRG implementation funding across the different funding tiers. As stated on page 48, EPA reserves the right to exceed the targets outlined above in the event that there is an inadequate number of meritorious applications from entities in other jurisdictions.

VI. Evaluation and Awards

Q1: What are the differences between the Tribes and territories NOFO and the general competition NOFO? If Tribes and territories are considering whether to apply to both NOFOs, what do they need to know?

A1: Tribes and territories may apply to both the general competition and the competition only for Tribes and territories. Note that to participate in the general competition, Tribes and territories will have to meet the requirements of the general competition. Importantly, to compete in the general competition, the PCAP on which any Tribal or territorial implementation grant application is based must be submitted to EPA by March 1, whereas to compete in the Tribes and territories competition, the PCAP on which their implementation grant application is based must be submitted to EPA by April 1.

In addition, the evaluation criteria for the two competitions are different and the workplan can be up to 25 pages for the general competition, whereas the workplan is limited to 15 pages for the Tribes and territories competition application. The general competition has five funding tiers with grant awards ranging from \$2 million to \$500 million, whereas the Tribal competition has three funding tiers with grant awards ranging from \$1 million to \$25 million. These are some of the major differences between the two competitions.

Q2: What is EPA's process for scoring the applications and awarding the grants?

A: The evaluation criteria and selection process are explained in Section V of the NOFO. Applications will first be evaluated against the threshold factors listed in Section III.C. of the NOFO. Only those applications that meet all of the threshold factors will be evaluated by a review panel using the evaluation criteria in the NOFO. Each eligible application will be given a numerical score and will be rank ordered by the review panel against other applications in the same funding tier. For this Tribes and territories competition, EPA will have three funding tiers as described in Section II.B. EPA intends to make awards to top ranked applications in each tier. Preliminary funding recommendations will be provided to the EPA selection official based on the panel reviews and rankings. Final funding decisions will be made by the EPA selection official based on the rankings and preliminary recommendations of the EPA evaluation team and the other factors listed in Section V.C.

Q3: Will Tribes need to discuss and calculate benefits to low-income and disadvantaged communities if applying under the Tribes and territories competition?

A3: As described on page 32 of the Tribes and territories competition NOFO (regarding section 4 of the work plan on benefits and community engagement), applications should discuss benefits and potential disbenefits to communities, particularly those that are disadvantaged or overburdened by pollution, from their proposed GHG reduction measures.

Federally recognized Tribes meet the definition of disadvantaged communities for the purposes of the CPRG grant program (page 11 of the NOFO). A Tribal application to the Tribes and territories competition should include Tribal community benefits that would result from implementation of the measures.

Q4: If we do not have a history of managing EPA grants, will that negatively affect the points we get for criteria 5.a (past performance) and 5.b (reporting requirements)? Will this effectively disqualify our application or limit our chances to secure CPRG grant funding?

A4: If your organization does not have a history of managing EPA grants, it will not disqualify your application. Page 47 of the Tribes and territories NOFO, under section 5, "Programmatic Capability and Past Performance," states: "Note: In evaluating applicants under the past performance criteria in 5.a and 5.b, EPA will consider the information provided by the applicant and may also consider relevant information from other sources, including information from EPA files and from current/prior grantors (e.g., to verify and/or supplement the information provided by the applicant). If the applicant does not have any relevant or available past performance or reporting information, please indicate this in the application. The application will receive a neutral score for criteria 5.a and 5.b. A neutral score is 2.5 points of 5 possible points for each criterion. If the applicant does not provide any response for these items, they may receive a score of 0 for these criteria."

Applicants may also include information describing their programmatic capability and past performance in managing assistance agreements funded by other federal or non-federal entities.

Q5: EPA provides templates for several of the required deliverables (e.g., Cover Page, Budget Table, etc.). Am I required to use these resources in my application?

A5: No, you are not required to use these templates for your application. Use of these example templates is optional. However, we do encourage the use of these example templates to help expedite EPA's application review process.

Q6: Where should I send a question about the Evaluation Criteria or other application requirements?

A6: Questions regarding all aspects of the CPRG implementation grants NOFOs (including evaluation criteria and required application requirements) should be directed to the EPA email address: CPRG@epa.gov. EPA will update this Q&A document on a regular basis with the responses to incoming questions. EPA does not intend to respond to each email individually.

Q7: EPA provides a list of GHG reduction measures in the Tribes and territories competition NOFO. Are these the only measures that EPA will fund under this program?

A7: On pages 8-11 of the NOFO, EPA provided a list of *example* GHG reduction measures in six key sectors. This list is neither exhaustive nor definitive with respect to the measures that may be included in competitive applications under the Tribes and territories competition. These are not the only measures that EPA will consider eligible for funding under CPRG implementation grants. Applicants should consider the evaluation criteria in Section V.A when deciding on which measure or measures to include in their applications.

Q8: What types of applicant diversity will be considered in the selection process?

A8: EPA anticipates awarding no more than two grants to applicants at the same level of government within a single jurisdiction (e.g., a single Tribal area or territory). In addition, EPA will make selections to ensure diverse geographic coverage of CPRG implementation funding across the different funding tiers. However, EPA reserves the right to exceed these targets in the event that there is an inadequate number of meritorious applications from entities in other areas.

In making the final funding decisions, the EPA selection official may also consider certain programmatic priorities and the geographic diversity of awardees. Additional consideration may be given to making awards that advance the Justice40 Initiative, provide GHG reduction measures in key sectors, and/or provide greater diversity in the types of entities receiving CPRG implementation funds. (e.g., Tribal and territorial agencies and departments). Once final decisions have been made, a funding recommendation will be developed and forwarded to the EPA award official (Section V.B and C of the NOFO).

Q9: Do I need to quantify criteria air pollutant (CAP) and hazardous air pollutant (HAP) emissions impacts in the application?

A9: While quantified CAP and HAP emissions estimates are not required for the application, applicants should **list** CAP and HAP emissions reductions as expected outcomes in section 3 of the workplan if they are expected from the proposed measures in the application. Such applications should qualitatively list CAP or HAP reductions or, where possible, quantify CAP and HAP emissions reductions in section 4 of the workplan.

Q10: Do I need to quantify GHG emissions impacts in the application?

A10: Yes, EPA will assess applications on the magnitude of GHG emission reductions estimated for the proposed measures.

Q11: How will EPA evaluate the magnitude of GHG emission reductions? Will it consider the relative reductions achieved for the entities?

A11: Under evaluation criteria 2.a and 2.b, EPA will evaluate applications on the magnitude of GHG reductions achieved, regardless of the type of applicant (Tribe, Tribal consortium, coalition, etc.). This is in keeping with the programmatic priorities to reduce near-term GHG emissions contributing to climate change.

As explained in Section II.B of the NOFO, EPA has established tiers to reflect differences in scope, scale, and cost of GHG reduction measures. Applications will be evaluated against other applications in the same tier. As explained in Section V.C, in making the final funding decisions, the EPA selection official may also consider certain programmatic priorities and the geographic diversity of awardees. Additional consideration may be given to making awards that advance the Justice40 Initiative, provide GHG reduction measures in key sectors, and/or provide greater diversity in the types of entities receiving CPRG implementation funds.

New questions posted October 31, 2023

Q12: How will applicants be expected to demonstrate that they have explored federal and non-federal funding sources that are alternatives to the CPRG? For example, would an applicant need to have applied and been rejected by another IRA or BIL grant program, or would it be sufficient for the applicant to provide a general discussion of other funding sources they looked at and considered (but did not apply for)?

A12: As explained in section 1b of the workplan, applicants must demonstrate a strong need for CPRG implementation funding that is unmet by other funding sources. Applicants should explain if and how they have explored the availability of other federal and state grants, tax incentives, and other funding sources to implement their GHG reduction measures and why these sources are not sufficient. The application should include a list of federal and non-federal funding sources (e.g., EPA's GHG Reduction Fund Solar for All program) that the applicant has applied for, secured, and/or will secure to implement the GHG reduction measures, if applicable. For GHG reduction measures for which the applicant has secured partial funding, which may include tax incentives, the applicant should explain why CPRG funds are also needed. Applicants should review funding opportunities on the White House BIL Guidebook and IRA websites prior to applying under this announcement. Where applicants identified other funding sources but did not pursue those sources, the applicant may explain their reasoning. The implementation grants NOFO does not require that applicants must have applied to another grant program and been rejected in order to apply to CPRG.

New questions posted November 14, 2023

NEW *Q13: How is EPA defining "high-quality jobs"? What are "short-term" versus "long-term" jobs?*

A13: Applicants should review the eight [Good Jobs Principles](#) developed by the U.S. Department of Labor. Key characteristics of a high-quality job include family-sustaining wages and benefits, the free and fair choice to form or join a union, and an emphasis on worker health and safety. The Good Jobs

Principles describes good jobs as those where workers have job security, adequate hours and predictable schedules, and where temporary or contractor labor solutions are minimized. Furthermore, good jobs are those where workers have equitable opportunities to progress to future good jobs within their organizations or outside them; and where workers have transparent advancement opportunities and access to quality training and education.

Workforce development activities included in the application should focus on career pathways to high-quality jobs that enable economic mobility, rather than short-term, low-wage jobs (e.g. short-term seasonal, contract, or otherwise temporary employment). The goal of workforce development programs should be to improve the long-term economic wellbeing of the participant. As such, retention of participants in training programs and on the job is an important objective. Furthermore, workforce development programs should include strategies for including individuals with barriers to obtaining and retaining a job. Applications may request funding for supportive services, such as transportation and childcare. Workforce development programs should partner with employers, labor unions, and other similar organizations that are committed to interviewing, hiring, retaining, and mentoring participants.

The Department of Labor has produced several resources that can help potential applicants understand the Good Jobs Principles and implement them through federal funding programs including: [Good Jobs in Federal Investments: A Toolkit for Employers, Workers, and Government](#); [Good Jobs Initiative Job Quality Check List](#); [Good Jobs In Federal Investments: Data and Reporting Appendix](#).

NEW Q14: How does EPA define “equitable workforce development”?

A14: Equitable workforce development means creating workforce development opportunities that are broadly available and accessible to all individuals in low-income and disadvantaged communities regardless of income, race, color, national origin, Tribal affiliation, disability, or any other non-merit factor. Equitable workforce development activities may consider the barriers to training, employment, and job retention participants may face and incorporate appropriate supports for participants to address those barriers. Equitable workforce development may focus on outreach and recruitment to all individuals from low-income and disadvantaged communities. Finally, equitable workforce development should focus on providing high-quality job opportunities where workers have a safe, healthy, and accessible workplace and where they are free from harassment and discrimination at work, in keeping with the Department of Labor [Good Jobs Principles](#).

NEW Q15: How does EPA define “middle-skilled careers,” and is there a list of such careers?

A15: EPA considers middle-skilled careers as those that require education and training beyond an entry-level job. Middle-skill careers often require an industry-recognized credential. These are careers that enable upward economic mobility and strong middle-class wages, including for those without a college degree.

EPA does not provide an exhaustive list of middle-skilled careers. In addition to industry-recognized credentials, wages and benefits are important metrics for the quality of a job. Applicants may consider reviewing data from the U.S. Department of Labor’s Bureau of Labor Statistics on wage data by area and occupation.

EPA highlights [Registered Apprenticeships](#) as an example of a high-quality training model that promotes entrance into middle-skilled careers. Registered Apprenticeship Programs are industry-led and aligned with employer needs; provide structured learning and mentorship opportunities; are paid jobs with

progressive wages; and allow participants to earn a portable, nationally-recognized credential within their industry.

NEW Q16: *How "shovel ready" do measures in implementation grant applications need to be? Will projects be scored higher if they can demonstrate speedy implementation?*

A16: Any measure proposed for funding under the CPRG implementation grants general competition must be included in a Priority Climate Action Plan (PCAP), a narrative report due on March 1, 2024, that includes a focused list of near-term, high-priority, implementation-ready measures to reduce GHG pollution. Implementation grants awarded under this program will have an estimated period of performance of up to five years with the estimated project start date for awards of October 1, 2024 (see Section II.F of the NOFO).

As explained in Section I.B of the NOFO, EPA encourages applicants to seek funds for GHG reduction measures that will significantly reduce cumulative GHG emissions by 2030 and beyond and that will accelerate decarbonization across one or more major sectors responsible for GHG emissions. EPA will score grant applications based on multiple evaluation criteria described in Section V.A of the NOFO with an emphasis on the magnitude of near-term GHG reductions that will be achieved by the proposed measures. As explained in evaluation criteria 2 in Section V.A of the NOFO, applications will be evaluated on the magnitude of cumulative GHG emission reductions and the durability of the reductions to be achieved from 2025 through 2030 and from 2025 through 2050.

In evaluation criterion 1.c, EPA will also evaluate applications on the extent to which the proposed GHG reduction measures have the potential to create transformative opportunities or impacts that can lead to significant additional GHG emissions reductions (page 28 of the NOFO).

Finally, in evaluation criterion 3.c, EPA will evaluate each application on the extent to which it provides a detailed implementation timeline for each measure, including key milestones for specific tasks, and discusses the key actions needed to meet the projects goals and objectives by the end of the grant period.

NEW Q17: *What is considered cost effective (in terms of dollars per CO₂e reduced)? Is there a standard we should be striving for?*

A17: EPA does not have a threshold or recommended cost per dollar of CO₂e reduced. As discussed under evaluation criterion 2.c in Section V of the NOFO, each application will be evaluated on the quality of the response and the:

- Cost effectiveness of the GHG reduction measures in terms of the CPRG implementation grant dollars requested divided by cumulative GHG metric ton of CO₂-equivalent emission reductions to be achieved from 2025 through 2030 for the set of measures in the application, and
- Qualitative narrative explaining any factors that may affect the cost-effectiveness calculation.

As explained in Section II.B of the NOFO, EPA has established tiers to reflect differences in scope, scale, and cost of GHG reduction measures. Applications will be evaluated against other applications in the same tier.

NEW Q18. *Will we need a Quality Assurance Project Plan (QAPP) for projects funded with implementation grant funds?*

A18: A QAPP is required for all projects funded by EPA that involve collection and/or use of environmental data. For more information see [Frequently Asked Questions about EPA's Quality Program](#).

NEW Q19. *Please expand upon your guidance on Question 4 above, which states "EPA will not fund duplicative work, i.e., multiple grants cannot fund the same measure being implemented in the same exact or overlapping geographic vicinity."*

A19: EPA will not fund duplicative work, i.e., two entities may not both receive funding if they would spend funds on the same or overlapping measures. Additional examples of applications that would be considered duplicative or not considered duplicative are listed below.

Examples of Duplicative Work:

- A grant to build heavy-duty electric vehicle charging at locations A, B, and C and a grant to build heavy-duty electric vehicle charging at locations A and B.
- A grant to reduce methane emissions by capping landfills across an entire territory and a grant to reduce methane emissions by capping a specific landfill in a territorial municipality also included on the territory's list of landfills.
- A grant to install energy efficient heat pump water heaters in Tribal households at or below the federal poverty line and a grant to another department of the same Tribal government to perform comprehensive energy efficiency upgrades including installing heat pump water heaters in households at or below 150% of the federal poverty line.

Examples of Non-Duplicative Work:

- A grant to reduce emissions from heavy-duty vehicles on Tribal lands by building heavy-duty electric vehicle charging and a grant to reduce emissions from heavy-duty vehicle on the same Tribal lands by providing rebates for electric heavy-duty vehicles.
- A grant to a coalition of local governments to reduce methane emissions by capping a landfill in one part of the territory and a grant to a different coalition of local governments to reduce methane emissions from a different landfill in a different part of the territory.
- A grant to a Tribe's housing authority to pay for residential energy efficiency projects and a grant to a Tribe's economic development department to pay for commercial energy efficiency projects.

EPA does not prohibit two eligible applicants from applying to fund duplicative work as each application would be reviewed independently. However, EPA will not award multiple grants to implement the same work in the same location. Further, EPA does not intend to partially fund applications. Therefore, EPA strongly recommends that entities that may be considering applying for funding to implement similar measures communicate and coordinate prior to submitting applications.

Climate Pollution Reduction Grant Program

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Note: In limited circumstances, EPA reserves the right to partially fund an application. If EPA decides to do so, it will do so in a manner that does not prejudice any applicants or affect the basis upon which the application was evaluated and selected for award (see Section II.C of NOFO).